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December 1, 2016

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., TW – A325  
Washington, D.C. 20554

**Ex Parte Submission**

RE: Transition from TTY to Real-Time Text Technology, GN Docket 16-145; Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology and Petition for Waiver of Rules Requiring Support of TTY Technology, GN Docket No. 15-178

Dear Ms. Dortch:

On November 28, 2016 Linda Vandeloop of AT&T, spoke with Michael Scott, Consumer and Government Affairs Bureau, Federal Communications Commission ("Commission"), via telephone concerning the Real-Time Text ("RTT") rulemaking. This letter summarizes the matters discussed during that conversation.

AT&T confirmed its continued efforts and progress toward RTT implementation and expressed its appreciation of the Commission's willingness to work with all stakeholders to resolve any issues or concerns. AT&T is evaluating the features its customers' desire in an RTT offering and urges the Commission to not include a list of specific features in a mandate or as performance objectives. A mandate would prematurely impose technical requirements on a RTT technology that is in its infancy and that may not support the feature, especially in initial releases.

While performance objectives coupled with an achievability defense provide more flexibility, they still impose rigorous requirements on device manufacturers and service providers to justify their decisions in an area without objective guidelines. Performance objectives still require a complete focus on achievement of the objective, possibly to the detriment of other features that may be of more value to the customer. Moreover, specific features that are hardwired into the rules, like TTY, often become outdated and outlive their usefulness, even when merely placed as performance objectives. At a minimum, AT&T recommends that these issues be addressed more fully in a Further Notice of Proposed Rulemaking ("FNPRM"). To the extent that the Commission mandates specific features for RTT, such as simultaneous voice and text and an incoming RTT indicator, those requirements should become effective with the deadlines for manufacturers and service providers to make RTT a native function in the device.

Marlene H. Dortch, Secretary

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In the comment cycle, some commenters objected to an RTT requirement and to the adoption of RFC 4103 as a safe harbor for RTT. We are making good progress in implementing RTT and would like our customers who use RTT to be able to communicate with other carrier customers but we believe that most carriers are likely to implement RTT even without a mandate. However, to the extent there is an RTT interoperability requirement, we strongly support the RFC 4103 safe harbor. Absent a safe harbor, technology may be incompatible or we may be forced to make costly network adjustments so that our customers can communicate with other carrier customers who choose a different technology.

Finally, AT&T agrees with commenters who suggest it is important to review the potential impacts of RTT on the relay fund and to adjust the fund as appropriate over time as those impacts become clear. We support addressing these issues in an FNPRM

In accordance with section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, reading "Linda A. Vandeloop". The signature is written in a cursive, flowing style.

Cc: Suzy Rosen Singleton  
Karen Peltz Strauss  
Michael Scott